

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Administration of the
North American Numbering Plan
Carrier Identification Codes (CICs)

CC Docket No. 92-237

COMMENTS OF SBC COMPANIES

Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell (the SBC Companies) file these comments in support of the Petition for Clarification filed by BellSouth Corporation.

BellSouth's petition relates to how the blocking of three-digit CIC in all equal access switches can be performed. The Commission has ruled that "after June 30, 1998, all CICs will be four digits in length."¹ The Commission set out a 2 step transition process. The first phase, which expires January 1, 1998, requires all LECs to recognize four-digit CICs in their network. The second phase, which expires July 1, 1998, requires only four-digit CICs, and seven digit CACs to be recognized.

BellSouth, however, correctly points out that the blocking of existing three-digit CIC codes will take some time to institute throughout all central offices. BellSouth believes that the Commission intended that three-digit CICs remain permissive for all carriers and their customers throughout the entire second phase of the two-step transition

¹ Administration of the North American Numbering Plan Carrier Identification Codes, CC Docket 92-237, Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking and Order, released October 22, 1997 ("CIC reconsideration Order") at 4, 20.

ordered in the CIC Reconsideration Order. An alternative reading of the CIC Reconsideration Order is that the blocking of three-digit CICs must begin prior to July 1, 1998 so that all switches can be completed by July 1, 1998. The issue, therefore, is whether July 1, 1998 is the date by which no three-digit CICs will be accepted, or whether the blocking 3-digit CICs should begin on July 1, 1998, and end at some point later after all switches have been converted.

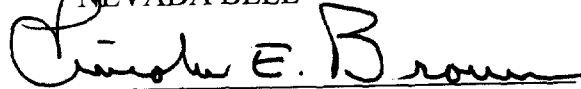
The SBC Companies agree with BellSouth that a better reading of the order is for July 1, 1998 to be the date on which the conversion to three-digit CIC blocking should begin. That way, the entire transition period (from January 1, 1998 to July 1, 1998) can be used for carriers to educate customers about the new carrier access code dialing requirements. The SBC Companies have similar issues as BellSouth with respect to blocking of three-digit CICs in our network. We will need some period of time to change all of the switches in our network to stop accepting the three-digit CICs. Particularly with our DMS-100, it takes a significant amount of time to convert each office. We also need to coordinate with the carriers as they convert their trunk groups to four digit CICs. That period of time is necessary to ensure that each switch is updated to preclude recognizing the 10XXX dialing pattern, and to ensure that an appropriate message is played to callers who attempt to use a three-digit CIC. Also, during 1998, various other mandated implementations are scheduled to occur, including Local Number Portability, area code splits, and other local competition related items.

Therefore, the SBC Companies support the Bell Atlantic Petition for Clarification.

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CERTIFICATE OF SERVICE

I, David Hudson, certify that the following is true and correct:

I am a citizen of the United States, State of California, am over eighteen years of age, and am not a party to the within cause.

My business address is 140 New Montgomery Street, San Francisco, California 94105.

On December 26, 1997, I served the attached "COMMENTS OF SBC COMPANIES" in CC Docket No. 92-237 by placing true copies thereof in envelopes addressed to the parties in the attached list, which envelopes, with postage thereon fully prepaid, I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

Executed this 26th day of December, 1997 at San Francisco, California.

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By: 
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